

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW,
STATE LAW AND INSURANCE
LITIGATION

MDL Docket No: 09-md-02052 (TPG)
Master Docket No: 08 Civ. 11117
(TPG)

This Document Relates to:
All Actions: 08 Civ. 11117 (TPG)
09-md-02052 (TPG)

**THE HAINES PLAINTIFFS' MOTION
FOR RELIEF FROM MEDIATION AND SETTLEMENT
CONFIDENTIALITY PROVISIONS**

PLEASE TAKE NOTICE that Plaintiffs Madelyn Haines and Paul Zamrowski (“Movants”) respectfully move for the Court for an order that would provide them relief from the current settlement and mediation confidentiality agreements, so that, they would have access to all mediation related documents and be able to utilize the same in connection with these settlement related proceedings; and they could utilize all available evidence to refute the statements of fact made in Lead Counsels’ May 25, 2011 filings about (a) the Haines Objectors and their counsel, (b) the events that occurred in mediation, and (c) the issues on whether the Settlement, POAs and attorneys fees should be approved.

This motion is based upon this Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Vincent T. Gresham, and the complete files and records in this action, and such other written and oral arguments presented to the Court.

WHEREFORE, the Haines Plaintiffs respectfully request that the Court provide them with relief from the current confidentiality agreements and grant such other and further relief as this Court may deem just and proper.

Respectfully submitted May 31, 2011,

/s/

Vincent T. Gresham

(pro hac 9/24/2010)
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